

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re: § Chapter 11
KRISJENN RANCH, LLC §
Debtor § Case No. 20-50805
§

KRISJENN RANCH, LLC and §
KRISJENN RANCH, LLC-SERIES §
UVALDE RANCH, and KRISJENN §
RANCH, LLC-SERIES PIPELINE §
ROW as successors in interest to §
BLACKDUCK PROPERTIES, LLC, §
Plaintiffs §

v.

DMA PROPERTIES, INC., and §
LONGBRANCH ENERGY, LP, § Adversary No. 20-05027
Defendants §

DMA PROPERTIES, INC §
Cross-Plaintiff/Third Party Plaintiff §

v.

KRISJENN RANCH, LLC, §
KRISJENN RANCH, LLC-SERIES §
UVALDE RANCH, and KRISJENN §
RANCH, LLC-SERIES PIPELINE ROW, § Adversary No. 20-05027
BLACK DUCK PROPERTIES, LLC, §
LARRY WRIGHT, and JOHN TERRILL §
Cross-Defendants/Third-Party §
Defendants §

SUPPLEMENT TO KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS
SUCCESSORS IN INTEREST TO BLACK DUCK PROPERTIES, LLC'S RESPONSE
TO DMA PROPERTIES, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT
ON DMA'S OWNERSHIP INTEREST IN THE BIGFOOT NOTE PAYMENTS

TO THE HONORABLE CHIEF BANKRUPCY JUDGE RONALD B. KING:

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors in interest to Black Duck Properties, LLC (collectively the “Debtors”), files this Supplement to Debtors’ Response to Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments, which was inadvertently missing from Debtors’ Response to DMA’s Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments, and would respectfully attach as follows:

1. Exhibit D to KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as Successors In Interests to Black Duck Properties, LLC’s Response to DMA Properties, Inc.’s Motion for Partial Summary Judgment on DMA’s Ownership Interest in the Bigfoot Note Payments

WHEREFORE PREMISES CONSIDERED Debtors pray that this Court grant leave to supplement with the attached Exhibit D and for all other such further relief to which they may be entitled.

Dated: October 7, 2020

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller
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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 7th day of October 2020:

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shane.p.tobin@usdoj.gov
United States Trustee

/s/ John Muller
C. John Muller IV

EXHIBIT D

Date: 7/14/17 4:24 PM (GMT-05:00)

To: Daniel Moore <palmettolandandfarms@hotmail.com>

Cc: Hagan Cohle <hscohle@yahoo.com>, Rod Roberts <rod@lancerresources.com>, Larry <larrymwright54@yahoo.com>, Darin Borders <darinborders@gmail.com>

Subject: Re: The Express Gas Pipeline, LP to Black Duck Properties, LLC

Mr. Moore,

I am dealing directly with Mr. Wright. I will defer your email to Mr. Wright.

Chase Palmer
Palmer Law Firm, Inc.

[301 N. Wellington Street](#)
Marshall, Texas 75670
Phone - (903)935-9303

Fax - (903)935-0822

CONFIDENTIALITY NOTICE : THIS MESSAGE CONTAINS INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED.

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On Fri, Jul 14, 2017 at 3:15 PM, Daniel Moore <palmettolandandfarms@hotmail.com> wrote:

Let me try again. We all expected things that didn't happen and would have appreciated a lot. Darren Borders tells me Rod says if we do not have the sign documents by 2pm then the deal is off and he is keeping Larry's f_____ing money. Simple question: Are you telling me that if I do not personally send you the signature w notary today or Monday then your groups illusion or opinion is that Larry's out of his money and the deal is off? I am traveling across country with 3 kids, dogs, wife etc.. I have never dealt with demands like yours before. You run a hard line when it's time to sign shit the way you want it... but do nothing to put documents together when requested by the group that's paid \$925k ... what is your stance? I am ready to quit the kitty shit.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Chase Palmer <cpalmerplf@gmail.com>

Date: 7/14/17 3:49 PM (GMT-05:00)

To: Daniel Moore <palmettolandandfarms@hotmail.com>

Cc: Hagan Cohle <hscohle@yahoo.com>, Rod Roberts <rod@lancerresources.com>, Larry <larrymwright54@yahoo.com>, Darin Borders <darinborders@gmail.com>

Subject: Re: The Express Gas Pipeline, LP to Black Duck Properties, LLC

Mr. Moore,

Please have the document executed and returned as soon as possible, preferably today. If you can stop at a bank and sign the document before a Notary and have them fax that signature page to my fax number (903-930-0822), that would be appreciated and expected.

Chase Palmer
Palmer Law Firm, Inc.

<301 N. Wellington Street>
Marshall, Texas 75670
Phone - (903)935-9303

Fax - (903)935-0822

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On Fri, Jul 14, 2017 at 2:43 PM, Daniel Moore <palmettolandandfarms@hotmail.com> wrote:

Chase, I am traveling to SC. Will you accept Larry's signature on behalf of Black Duck Properties? Or do you insist on my signature with notary today?

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Chase Palmer <cpalmerplf@gmail.com>

Date: 7/14/17 3:17 PM (GMT-05:00)

To: Hagan Cohle <hscohle@yahoo.com>, Rod Roberts <rod@lancerresources.com>